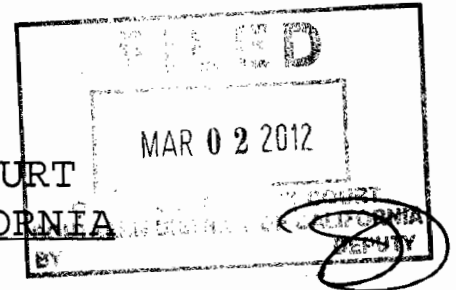


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



UNITED STATES OF AMERICA)
)
Plaintiff,)
v.)
STEVEN MARTINEZ,)
)
Defendant.)

Magistrate Case No. **12MJ0767**

COMPLAINT FOR VIOLATION OF
U.S.C. Title 18 Section
1512(a)(1)(A), Witness
Tampering

The undersigned complainant being duly sworn states:

Count 1

That on or about March 1, 2012, in the Southern District of California, STEVEN MARTINEZ, the defendant, did attempt to kill Marianne Harmon by engaging in a murder for hire scheme, with the intent to prevent the attendance and testimony of Marianne Harmon in an official proceeding, namely, United States of America vs. Steven Martinez, criminal case number 11CR1445-WQH, in violation of Title 18, United States Code, Section 1512(a)(1)(A).

Doa 3/2/12

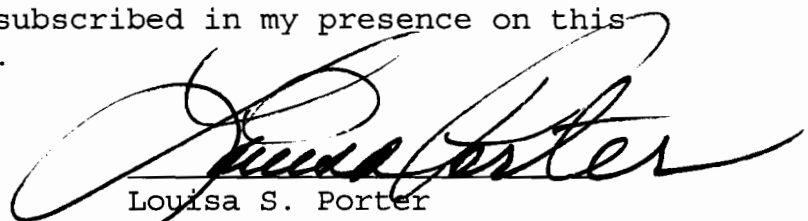
Count 2

That on or about March 1, 2012, in the Southern District of California, STEVEN MARTINEZ, the defendant, did attempt to kill Monique Siegel by engaging in a murder for hire scheme, with the intent to prevent the attendance and testimony of Monique Siegel in an official proceeding, namely, United States of America vs. Steven Martinez, criminal case number 11CR1445-WQH, in violation of Title 18, United States Code, Section 1512(a)(1)(A).


SIGNATURE OF COMPLAINANT

Traniece Jackson, Special Agent
Federal Bureau of Investigations

Sworn to before me, and subscribed in my presence on this
First day of March, 2012.



Louisa S. Porter
United States Magistrate Judge

1 CONTINUATION OF COMPLAINT:

2 UNITED STATES v. STEVEN MARTINEZ

3
4 AFFIDAVIT

5
6
7 I, Traniece Jackson, Special Agent (SA) of the Federal Bureau of
8 Investigation (FBI) for the past 5 1/2 years, being duly sworn, depose
9 and say:

10 I am currently assigned to a violent crime squad in the San Diego
11 Field Division of the FBI and investigate violent crimes. The
12 information contained in this affidavit is based upon my personal
13 knowledge and on the information I have learned from reviewing
14 official reports and speaking with local, federal law enforcement
15 officers, and individuals.

16 This affidavit is in support of a Complaint for STEVEN MARTINEZ,
17 date of birth December 4, 1961, for violations of Title 18 of the
18 United States Code, Section 1512(a)(1)(A), Witness Tampering.

19 Approximately two weeks ago, MARTINEZ contacted his former
20 employee at the employee's residence, located within the Southern
21 District of California. MARTINEZ provided the former employee with
22 four packages of documents containing personal identifying information
23 about four separate individuals, including Marianne Harmon and Monique
24 Siegel. MARTINEZ also provided color photographs of Ms. Siegel's
25 condominium and of Ms. Harmon. The photographs of Ms. Siegel's
26 condominium were marked up with notations such as "front door" and
27 "patio."
28

1 MARTINEZ told the former employee something to the effect of
 2 "that bitch, Harmon, wore a wire" and recorded their conversations.
 3 The former employee was aware that MARTINEZ was presently under
 4 indictment for what he referred to as "tax charges" and claimed he was
 5 present at MARTINEZ's home during the IRS raid. MARTINEZ told the
 6 former employee he could make him rich for the rest of his life,
 7 \$100,000 cash, if he eliminated the "lady in Rancho Santa Fe" and the
 8 "lady in La Jolla." The information MARTINEZ provided showed that Ms.
 9 Harmon lives in Rancho Santa Fe and that Ms. Siegel lives in La Jolla.
 10 The FBI confirmed both victims' addresses. MARTINEZ also suggested
 11 that the former employee use two different pistols for the murders and
 12 that he acquire a silencer.

13 On February 28, 2012, the former employee contacted the San Diego
 14 Division of the FBI to report the potential murder for hire by
 15 MARTINEZ. On February 29, 2012, the former employee met with agents
 16 of the FBI and remitted the documentation provided by MARTINEZ. The
 17 former employee also reported that MARTINEZ contacted him via cellular
 18 telephone and set up a second meeting for March 1, 2012 at 7:30 a.m.
 19 at the former employee's residence.

20 On February 29, 2012, the United States Attorney's Office
 21 confirmed that Ms. Harmon and Ms. Siegel are key witnesses in a multi-
 22 count indictment against MARTINEZ entitled: United States v. Steven
 23 Martinez, criminal case number 11CR1445-WQH, which is pending trial
 24 in the United States District Court for the Southern District of
 25 California.

26 On March 1, 2012, MARTINEZ went to the former employee's
 27 residence within the Southern District of California. This meeting


1 was audio and video recorded by the FBI. MARTINEZ offered the former
2 employee \$100,000 to kill Ms. Harmon and Ms. Siegel. MARTINEZ told
3 the former employee to get rid of the documentation, because if law
4 enforcement found the documents, he "would be dead."

5 MARTINEZ provided additional information about how to best enter
6 Ms. Siegel's residence, including information about her gate, which
7 is typically unlocked, and her sliding door, which is typically kept
8 open. MARTINEZ also clarified that the \$100,000 payment was not just
9 for Ms. Harmon, and possibly her husband, but also for "the Old Tree."
10 Ms. Siegel is 86 years old. MARTINEZ explained that he expected law
11 enforcement to contact him regarding the murders and expressed concern
12 that the remaining witnesses would be provided protection by law
13 enforcement, given their connection to his pending criminal case.


14 MARTINEZ also explained that after the former employee committed
15 the murders, he should contact MARTINEZ's business associate at a
16 particular telephone number and provide a code to receive payment.
17 MARTINEZ wrote this information down and left it with the former
18 employee. The meeting concluded with MARTINEZ's assumption that the
19 former employee would carry out MARTINEZ's wishes within the next 48
20 hours.

21 The foregoing information and evidence indicates that STEVEN
22 MARTINEZ, on March 1, 2012, attempted to kill Marianne Harmon and
23 Monique Siegel by engaging in a murder for hire scheme with the intent
24 of preventing Ms. Harmon's and Ms. Siegel's testimony in United States
25 vs. Steven Martinez, criminal case number 11CR1445-WQH, in violation
26 of Title 18, United States Code, Section 1512(a)(1)(A).

1 The foregoing is true and correct to the best of my information
2 and knowledge.

3
4 
5 Traniece Jackson
6 FBI Special Agent

7 Sworn to before me and subscribed in my presence this 1st day of
8 March, 2012.

9
10 
11 Honorable Louisa S. Porter
12 United States Magistrate Judge
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